Federal Communications Commission FOCM Washington, DC 20554

MAY 20 1998

WT Docket 98-143

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In the matter of 1998 Biennial Review of the Commission's Amateur Service Rules

To: Federal Communications Commission

From: Thomas R. Walter - AA9EA

Concerning: Comments on WT Docket 98-143

# INTRODUCTION:

Here is a outline of proposals to streamline the FCC's Amateur Radio Service which I agree with, and a sample gameplan for implementation that would result in:

- A.) The FCC having a more manageable Amateur Radio service.
- B.) Changes benifiting the majority of currently licensed Hams.
- C.) The Amateur Radio Hobby being much more attractive to newcomers.

#### MAIN:

The overhaul can be accomplished within a three year period, with the first step being to establish a final date for Novice Class testing.

On the final date for Novice testing, the following (A & B) shall occur:

- A.) A date two years after final Novice testing shall be set for what we will call (for purposes of this outline) Changeover Day.
- B.) Current Novices shall be notified of impending changes to the licensing structure, and they shall have two years to test for written elements required to acheive at least Technician-Plus Class (which will become General Class on Changeover Day).

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On Changeover Day, the following (A thru F) shall occur:

- A.) Novice Class question pool for written examination shall be assimilated into the General Class question pool.
- B.) Advanced Class question pool for written examination shall be assimilated into the Extra Class question pool.
- C.) Morse code speed requirements shall be reduced to 5WPM for General Class, and 10WPM for Extra Class.
- D.) Current six license classes shall be reduced to three.
  - 1.) Remaining Novice Class licenses shall be suspended.
  - 2.) Technician Class (no code) holders shall be unaffected.
  - 3.) Technician-Plus Class holders shall be granted General Class licenses.
  - 4.) General Class holders licensed before Changeover Day will not be required to take 10WPM code test when upgrading to Extra Class.
  - 5.) Advanced Class holders shall be granted Extra Class licenses, and all Advanced Class subbands become Extra Class subbands.
- E.) Novice HF CW subbands will be reallocated to Extra Class phone subbands.
- F.) Remaining Novices holding suspended licenses shall be given a two year grace period to upgrade, after which they will lose credit toward upgrade, and will be subject to complete retesting.

# SUMMARY:

Reducing the license classes to only Technician, General, and Extra will eliminate much of the housekeeping involved with Amateur Radio licensing.

Granting of greater HF privileges to entry level HF operators will make the hobby much more attractive to newcomers.

### COMMENTS ON OTHER ISSUES:

- 1.) The FCC's current stance on rules enforcement is not in need of modification. The FCC already does a respectable job of shutting down the most serious of rules violators.
- 2.) The RACES stations don't need special callsigns; call block can be eliminated. Stations operating in a civil defense capacity, however, should be required to append "Civil Service" (/CS for CW) when IDing to distinguish them from unauthorized out-of-band stations.
- 3.) There should always be a Morse Code requirement (even if minimal) for HF operators. Morse Code is too deeply ingrained in the history of radio, and the Ham persona to just do away with altogether.
- 4.) For Morse Code testing, the "fill in the blank" type test, although simplest, is quite adequate.
- 5.) Abuses of the code test medical exemption can be curbed by requiring a applicant for the exemption to be able to pass a sending test.

  If unable to operate a keying device, applicant would be required to enunciate the test; actually speaking the dits and dahs to be sent.
- 6.) Fine tuning of the question pools for written element testing can be done at a later time if necessary, with input from the VECs.

Respectfully submitted by:

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